Department Number C8020 Northwest Airlines, Inc. 5101 Northwest Drive St. Paul, MN 55111-3034



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Dockets Management System
U.S. Department of Transportation Dockets
Room Plaza 401
400 Seventh Street SW
Washington, DC 20590-0001

Subject: Powerplant Valves Controlled from the Flight Deck - Proposed Rule

References: FAA Docket No. FAA 2002-12244; Notice Number 02-08

To Whom It May Concern:

Northwest Airlines has reviewed the reference NPRM, and concurs with the intent of the proposed change to the regulations concerning the design requirements for powerplant valves controlled from the flight deck.

We agree that the changes are primarily clarification, and the change in phrasing regarding valve indications, intended to make Part 25 more closely coincide with JAR 25, is not significant in scope. While the current FAR Part 25 requires a means of positive indication of position and transition, rather than failure to respond to the selected position, Northwest Airlines is comfortable with the change. Most systems currently provide an alert if a valve has failed to reach the controlled position, whether or not the position is normally indicated. We feel that the indication of failure is more crucial to safe operation of the aircraft than constant indication of current position.

We agree that as the JAR 25 standards are more specific and, in some cases, more precise, adopting them into the proposed change to Part 25 is a step forward.

We appreciate the opportunity to respond to this proposed rule change.

Respectfully,

Mark Millam Chief Engineer

cc: Pete Lauria

Rob Levesque Steve Terrio